

Thank you for your thoughtful attention on the low power FM proposal before the Federal Communications Commission.

My company is Lakes Broadcasting Group INC. We operate a Class C FM (KLKS) in Breezy Point, MN.

Our major concern is over the delay this new class of FM will have on the implementation of digital terrestrial radio.

As you know, satellite DAB is expected to begin operations in 2001. As a result, hundreds of digital radio signals are possible. Their ability to niche formats will be incredible.

We share the Commission's enthusiasm that existing AM and FM operators should also broadcast digitally as soon as possible too. AT KLKS, we believe we will be able to compete well with S-DAB because of our ability to provide localism. However, we must be granted equal footing at the earliest possible date.

My greatest fear is this: as General Motors and Ford enter into this market through Delco and Philco, future auto receivers will specialize in SDARS radio to the detriment of analog AM and FM. There are technical hurdles in the issue of receiver interoperability.

It has been my experience that the AM feature in AM and FM receivers is clearly inferior to the FM feature. While FM has inherit advantages over AM, Am is deliberately neglected by radio manufacturers in the persuit of perceived listener preferences, worsening its situation.

Because GM and Ford are invested in satellite radio, the incentive will be to neglect AM and FM, causing a forced erosion in the listener base of terrestrial operators. IT becomes clear, our ability to compete on an even field will be predicated on our ability to broadcast digitally, delivering audio quality equal to S-DAB. We need to be in the game at the earliest possible time to command the attention of receiver manufacturers.

As you know, to permit LPFM, some adjaceny protections must be removed. Broadcasters are rightfully concerned about the interference low power FM will inflict on the spectrum. My concern is that while issues over LPFM interference are resolved, there will be further delays in the digital transition for AM and FM.

The FCC has proven proprietary to full power TV operators as they make the transition to digital. My firm owns an existing low power TV station (KLKS LP), which is being forced to move to a new channel to accomodate a full power TV station in Alexandria,

MN (KSAX). Further, it is my understanding that the FCC will not entertain any new LPTV applications until after the DTV roll-out.

I am asking that the same proprietary consideration be given to existing full power FM operators.

Satellite DAB will have dubious impact on issues critical to local communities.

Only terrestrial operators can address those needs and concerns. You should know that KLKS is actively meeting those needs, in its coverage area, by providing interview opportunities for anyone who asks. In fact we seek them out, including, but not limited to: legislators, opinion makers, educators, community activists and clergymen.

We feel these are the same important groups the FCC is seeking to address in the LPFM proposal. And, more often than not, our interviews are done during high-listenership drive times. We believe it makes for very good radio.

I fear we could lose our listener base and the FCC directive to serve in the public interest, if listeners are convinced they will get superior audio quality elsewhere.

Allow us to make the transition to digital as soon as possible. Give us the chance to get the same technological consideration, and in the same timely manner as satellite DAB from audio manufacturers. Don't cloud the issue while sorting through the LPFM debate.

This is the wrong time to consider the intrusion of low power FM on the spectrum.

Thank You Again for your Kind Consideration.

Bob Bundgaard  
President, KLKS FM